

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

MARILYN ECHEVARRIA DE PEÑA

Plaintiff

vs.

UNITED STATES OF AMERICA, ET AL

Defendants

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CIVIL NO. : 11-1388 (PG)

MOTON REQUESTING EXTENSION OF TIME

TO THE HONORABLE COURT:

Plaintiff, through the undersigned legal counsel, respectfully states, alleges, and prays as follows:

1. Defendants have filed a “Motion for Change of Venue”, (Docket 16).
2. The undersigned has recently returned from a holiday vacation; hence, it is, respectfully, requested that the Honorable Court grant an extension of time of twenty days to respond to defendant’s, motion, that is on or before January 23rd, 2012. Further, since various matters of law have been raised, it would be out of kilter to respond without a diligent research on the matters raised.

WHEREFORE, plaintiff, respectfully, requests the Honorable Court grant the extension herein requested, subject to any other pronouncement the Court deems just and appropriate.

Respectfully, submitted, in San Juan, Puerto Rico, this January 3rd, 2012.

I hereby certify that on this date I filed the present document with the Clerk of the Court through the Court’s CM/ECF system which will send notice of such filing to all counsels of

**Motion Requesting Extension of Time
Civil No. 11-1388 (PG)
January 3rd, 2012**

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record.

S/ Erick Morales-Pérez, Esq.
USDC-PR 203211

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